



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

December 11, 2015

The Honorable Gregory H. Woods  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: United States v. Karen Alameddine, 14 Cr. 808 (GHW)

Dear Judge Woods:

The United States respectfully submits this letter requesting an adjournment of the sentencing in the above-referenced case from December 21, 2015 until sometime in late January 2016. The reasons for the request, in which the defendant joins, are as follows. First, the November 1, 2015 amendments to the sentencing Guidelines appear to have produced a lower final offense level (level 23) than that agreed to by the parties pursuant to the Guidelines in effect prior to the amendments (level 25). Thus, the calculations in the Probation Department's Presentence Report ("PSR"), finalized prior to the amendments, appear to be incorrect; Probation's attendant sentencing recommendation therefore appears to be based on an incorrect final offense level. The Government and counsel for the defendant believe it would be appropriate for Probation to be given a chance to revise the PSR and reconsider its sentencing recommendation, in light of the Guideline amendments.

Second, the PSR refers to unresolved issues of restitution, based on certain categories of losses claimed or identified by the Hereditary Disease Foundation ("HDF"), the Title 18 victim in the case. Indeed, the amounts claimed by HDF in its letter to Probation are greater than those previously identified to and fully vetted by the Government. After discussing the restitution issue with counsel for the defendant, the Government believes that the additional period of time will allow the parties to conclusively resolve all restitution issues.

Thank you for considering this request. As noted above, counsel for the defense joins in the request.

Respectfully submitted,

PREET BHARARA  
United States Attorney

By: //s// Stanley J. Okula, Jr.  
Stanley J. Okula Jr.  
Assistant U.S. Attorney  
(212) 637-1585

cc: Defense Counsel

Application:   Granted   Denied

SO ORDERED:

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Honorable Gregory H. Woods, U.S.D.J.